

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JAMES SOTO,	)	
	)	
<i>Plaintiff,</i>	)	No. 1:24-cv-10869
	)	
v.	)	
	)	Hon. Martha M. Pacold
WILLIAM FOSTER, <i>et al.</i> ,	)	Magistrate Hon. Laura K. McNally
	)	
<i>Defendants.</i>	)	
	)	JURY TRIAL DEMANDED

**JOINT STATUS REPORT**

Pursuant to this Court's July 28, 2025 Minute Entry (Dkt. 194), the parties jointly submit this status report:

1. Since the last status report, the parties have continued exchanging written discovery, issued document subpoenas, and scheduled several third-party depositions.
2. On August 25, 2025, Plaintiff deposed Robert Jaquez but was unable to complete the deposition due to technical difficulties. Mr. Jaquez's continued deposition is set for September 5, 2025.
3. Defendants have deposed third-party witness Thomas Gutierrez on the date of this filing.
4. The parties have also scheduled the following depositions thus far:
  - a. Juan Padilla – September 3<sup>rd</sup> (Defense)
  - b. Robert Jaquez – September 5<sup>th</sup> to complete his deposition
  - c. Vince Hodge – September 9<sup>th</sup> (Plaintiff)
  - d. Wally Cruz – September 12<sup>th</sup> (Plaintiff)
  - e. Randy Hodge – September 15<sup>th</sup> (Defense)

f. Lisa Suarez – September 17<sup>th</sup>

5. Plaintiff intends to depose Robert Villagomez on October 15, 2025.

6. Additionally, the parties have blocked off more dates for depositions and have jointly designated certain dates as “Plaintiff-led” and others as “Defense-led” as outlined below.

<i>Plaintiff</i>	<i>Defendants</i>
<ul style="list-style-type: none"><li>• September 23</li><li>• September 26</li><li>• October 6</li><li>• October 7</li><li>• October 15</li></ul>	<ul style="list-style-type: none"><li>• September 30</li><li>• October 2</li><li>• October 16</li></ul>

7. The other witnesses the parties plan to depose at present, but have not yet scheduled, are:

- a. Hugo Flores
- b. Isabelle Gomez
- c. Mario Abarca
- d. Salvador Guzman
- e. Johnny Martinez
- f. Ruben Palomo
- g. Roger Ramirez
- h. Tyrone Ayala

8. Additional depositions will likely be scheduled by both parties once additional information is available, including from the Cook County State’s Attorney’s Office and from third parties pursuant to both outstanding and anticipated subpoenas.

9. The parties are also in the process of scheduling an inspection of the evidence held by the CCSAO’s office.

DATED: August 29, 2025

Respectfully Submitted,

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